

## Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <a href="http://about.jstor.org/participate-jstor/individuals/early-journal-content">http://about.jstor.org/participate-jstor/individuals/early-journal-content</a>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

## HARVARD LAW REVIEW.

Published monthly, during the Academic Year, by Harvard Law Students.

SUBSCRIPTION PRICE, \$2.50 PER ANNUM. . . . . . . . . 35 CENTS PER NUMBER.

## Editorial Board.

GORDON T. HUGHES, Editor-in-Chief. EDWARD B. ADAMS, HARVEY H. BAKER, JOHN A. BLANCHARD, ARTHUR H. BROOKS, EDWARD B. BURLING, RICHARD W. HALE, AUGUSTUS N. HAND, CHARLES P. HOWLAND.

Frank L. Hinckley, *Treasurer*. James A. Lowell, HERBERT A. RICE, WILLIAM R. SEARS, JOHN S. SHEPPARD, JR., JEREMIAH SMITH, JR., CHARLES WALCOTT, JOHN S. WOODRUFF.

JUDICIAL LEGISLATION. — Trustees v. Fennings, 18 S. E. (S. C.) 257, is a curious case. In Trustees v. McCully, 11 Rich. Law, 424 (1858), the South Carolina court held that evidence of adverse possession of land for twenty years would justify the jury in presuming a good title by lost deed; and this in the face of a statute of 1805, which perpetually exempted the land in question from the operation of the statute of limitations. The court in 1858 therefore practically re-enacted the statute which the Legislature in 1805 had specifically repealed. In the principal case, the right to disregard the presumption, left to the jury by Trustees v. McCully, is finally denied, and it is substantially held that the only facts admissible to rebut the presumption are those which would go to disprove adverse possession. The last distinction is gone between the statute of limitations, repealed by the Legislature, and the presumption enacted in its place by the court. "Although the statute . . . could not be pleaded in bar," say the latter, "yet . . . the Legislature did not interdict the defence of the presumption."

RIGHT TO PRIVACY AGAIN. - Marks v. Faffa (N. Y. Law Jour., Jan. 6, 1894), like other cases of its kind, furnishes in the action of the defendant most satisfactory evidence of the justice of the rule of law which gives men "the right to be let alone." The defendant, editor of a newspaper called "Der Wachter," started to publish portraits of the plaintiff, once an actor, now a law student, and of an actor called "Mogulesko," and invited his readers to give by vote their opinions as to which of the two was the more popular. Now it is a perversion of the law of truth in libel to say that it applies to such a case. It is not a case of libel but of invasion of privacy, of unwarrantable and impertinent disregard for the feelings of a person who has in no way offered himself for such criticism. Mc Adam, J., granted the injunction applied for, saying that the plaintiff's right was "too clear . . . to require further discussion." It is pleasant